

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION

UNITED STATES OF AMERICA	§	
	§	
V.	§	CRIMINAL NO. 1:12-CR-435-1
	§	
TOMAS YARRINGTON RUVALCABA	§	

UNOPPOSED MOTION TO CONTINUE SETTINGS

TO THE HONORABLE HILDA TAGLE,
SENIOR UNITED STATES DISTRICT JUDGE:

NOW COMES, TOMAS YARRINGTON RUVALCABA, Defendant herein, through his attorneys Chris Flood and Mervyn Mosbacker, Jr., and files this Unopposed Motion to Continue Settings, saying more particularly for cause as follows:

1. On November 12, 2019, this Court granted Defendant's Unopposed Motion to Continue Settings, as follows: Motions Filing due by December 20, 2019; Response to Motions due by January 9, 2020; Motion Hearing on February 12, 2020; Final Pretrial Conference on March 24, 2020; Jury Selection on March 31, 2020¹; and Jury Trial on April 1, 2020. Doc. 128.

2. Counsel for Defendant have been reviewing discovery in the U.S. Attorney's Office as well as discovery provided electronically. Additional time is needed to evaluate what pretrial motions should be filed, if any.

3. Defendant respectfully requests a three-week extension to file pretrial motions and suggest the following dates for other deadlines, consistent with the Court's schedule:

- Motions Filing due by: January 10, 2020
- Response to Motions due by: January 30, 2020
- Motion Hearing: March 4, 2020
- Final Pretrial Conference: April 14, 2020
- Jury Selection: April 21, 2020
- Jury Trial: April 22, 2020

4. Counsel have conferred with Assistant United States Jody Young who states the United States is unopposed to this motion.

Respectfully submitted,

/s/ Chris Flood

Chris Flood
Federal I.D. No. 9929
Email: chris@floodandflood.com
Flood & Flood
914 Preston at Main, Suite 800
Houston, TX 77002
(713) 223-8877
(713) 223-8879 fax

/s/ Mervyn Mosbacker, Jr.

Mervyn Mosbacker, Jr.
Email: mervynmosbacker@yahoo.com
2777 Allen Parkway, Suite 1000
Houston, Texas 77019
(713) 526-2246

ATTORNEYS FOR DEFENDANT

CERTIFICATE OF CONFERENCE

I hereby certify that I conferred with Assistant United States Jody Young who stated the United States is unopposed to this motion.

/s/ Chris Flood

Chris Flood

CERTIFICATE OF SERVICE

I hereby certify that on December 17, 2019, I electronically filed the foregoing document with the Clerk of Court using CM/ECF system which will send notification of such filing to all filing users.

/s/ Chris Flood

Chris Flood